



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

SEEMA KASSAB  
*Assistant Corporation Counsel*  
Phone: (212) 356-0827  
Fax: (212) 356-3509  
Email: [skassab@law.nyc.gov](mailto:skassab@law.nyc.gov)

March 30, 2023

**BY ECF**

Honorable Jennifer L. Ronchon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Monica Pagan v. City of New York, et al.,  
22-CV-1174 (JLR)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York and Gracjan Bielecki. Defendants write to respectfully request a stay discovery in this matter until after the settlement conference on May 5, 2023. Plaintiff's counsel, Joel Wertheimer, consents to this request.

The reason for this request is that the parties recently scheduled a settlement conference with Magistrate Judge Cave for May 5, 2023, which is not until after the current deadline for fact discovery on May 1, 2023. May 5<sup>th</sup> was the first available date for a settlement conference on Judge Cave's calendar that did not coincide with the undersigned's trial starting on April 24, 2023. The parties believe that a stay of discovery is appropriate to allow the parties to focus on settlement and avoid wasting time and resources on extensive discovery in the event that this case settles at the conference on May 5<sup>th</sup>. In the event that there is no settlement, the parties are willing to propose a revised discovery plan for the remainder of discovery, which will become more clear after the settlement conference.

For the reasons stated above, and for the sake of efficiency of time and judicial resources, defendants respectfully request a stay of discovery until after the settlement conference on May 5, 2023.

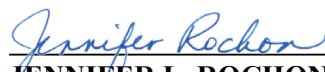
Thank you for your consideration in this matter.

The request is GRANTED. Discovery is stayed until May 5, 2023. If the parties do not reach a settlement they shall propose a new discovery schedule by May 12, 2023.

SO ORDERED.

Respectfully submitted,

Dated: April 3, 2023  
New York, New York

  
JENNIFER L. ROCHON  
United States District Judge

/s/ Seema Kassab

Seema Kassab

*Assistant Corporation Counsel*

cc: Joel Wertheimer (via ECF)  
*Attorney for Plaintiff*